

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RECEIVED

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AMERICAN GENERAL LIFE  
INSURANCE COMPANY,

Plaintiff,

v.

FREIGHT PRO. INC., and  
THE ESTATE OF JAMES B.  
PINCKARD,

Defendants.

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

CIVIL ACTION NO. 2:06cv151-MHT

**MOTION TO ALLOW INTERPLEADER OF FUNDS**

Comes now Plaintiff American General Life Insurance Company ("American General") and moves this Honorable Court for an order allowing Plaintiff to pay Two Hundred Fifty Thousand and 00/100 dollars (\$250,000), plus applicable interest, into the Registry of the Court, there to abide the judgment of this Court.

Respectfully submitted this 20<sup>th</sup> day of February, 2006.



David P. Donahue (DON025)

Attorney for Plaintiff, American General Life  
Insurance Company

**OF COUNSEL:**

**MAYNARD, COOPER & GALE, P.C.**  
1901 6th Avenue North  
Suite 2400, AmSouth/Harbert Plaza  
Birmingham, AL 35203-2618  
(205) 254-1000

**PLEASE SERVE DEFENDANTS BY CERTIFIED MAIL:**

Estate of James B. Pinckard  
c/o James R. Pinkard  
9692 Bent Brook Drive  
Montgomery, Alabama 36117

Freight Pro. Inc.  
c/o its Registered Agent  
John R. Wilson  
2320 Lower Wetumpka Road  
Montgomery, Alabama 36110